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**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

United States of America,

Plaintiff,

v.

Daniela Azucena Encinas-Villa,

Defendant.

4:22-cr-01913-JAS-LCK

MOTION TO CONTINUE TRIAL & OTHER DATES

(First Request by
Undersigned Counsel)
(Unopposed)

It is expected that excludable delay under Title 18, United States Code, §3161(h)(8)(B)(iv) will occur as a result of this motion or an order based thereon. Defendant Daniela Azucena Encinas-Villa, through counsel, respectfully requests this Court to continue the plea deadline, trial and all other dates presently set in this case for approximately sixty (60) days from the current trial date of October 29, 2024. Counsel needs a reasonable amount of additional time to effectively prepare for trial as she exercises due diligence in the preparation of the case for trial. (18 USC 3161(h)(8)(B)(iv))

Assistant United States Attorney Matthew G. Eltringham has no objection to the continuance. The defendant does not object to a continuance. All of the other co-defendants, except Rios-Sanchez, have pled and are awaiting sentencing. Counsel for co-defendant Rios-Sanchez has no objection to this motion.

This is the first request for continuance by undersigned counsel. It is expected that excludable delay under Title 18, United States Code, § (h)(7)(B)(i) will occur as a result of this motion or an order based thereon.

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6 Dated: October 4, 2024.

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LAW OFFICE OF WANDA K. DAY

/s/ Wanda K. Day
Wanda K. Day

Copy of the foregoing
Motion delivered by ECF to:

- Matthew G. Eltringham, Esq., AUSA
- Counsel for all co-defendants via ECF